

## Goodfellow, Bob

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**From:** McQuiddy, David  
**Sent:** Tuesday, April 23, 2013 1:23 PM  
**To:** Vela, Austin; Gray, David; Assunto, Carmen  
**Cc:** Broyles, Ragan; Webster, Susan; Smith, Monica; Mason, Steve; Goodfellow, Bob  
**Subject:** RE: Questions (West Fertilizer Explosion) - Draft Response

David, Carmen & Austin,

Please see below our Draft responses to the West Fertilizer Explosion questions you received.

1. One question is why the Risk Management Plan was from 2011? Is that because it was only required to be updated every five years? Would an update be required if suddenly the KINDS of chemicals stored there radically changed (as apparently they did?)

The RMP needs to be updated every five years unless the facility adds a process with covered chemicals above the threshold quantity or adds a new covered chemical to an already regulated process. It does not appear that any RMP regulated chemicals were added to the facility since the last submittal. The only RMP chemical we are aware of onsite was anhydrous ammonia.

2. What other agencies get involved in the RMPs?

The LEPC and local first responders are routinely apprised of the contents of the RMP, primarily the emergency response program portion of the RMP. Beyond that there are restrictions on the distribution of the 'offsite consequence analyses'.

3. Is there any coordination between this and the Tier 2 program (Homeland Security?) – the latest Tier 2 report DOES show that a large quantity of ammonium nitrate – TONS was on the site?

The LEPC and emergency management office are responsible for planning for chemical emergencies within the county. The LEPC receives the Tier II forms each year, so they are aware of the chemical inventories at each facility. Additionally, each RMP facility is required to coordinate their emergency plan with the LEPC. DHS has access to Tier II data for implementation of the DHS CFATS (Chemical Facility Anti-Terrorism Standards) program.

4. Has there been any kind of EPA study about the storage or hazards of ammonium nitrate? What experts have/can you identify for us on this since it formerly was commonly stockpiled (prior to the OK City bombing).

There have been general fact sheets and case studies issued by EPA (there are probably others as well), such as;

- "Prevention of Reactive Chemical Explosions Case Study: Waste Fuel/Oxidizer Reaction Hazards" in 2000, from Region 6 and CEPPPO
- "Chemical Accident Investigation Report, Terra Nitrogen, Port Neal, Iowa" which involved ammonium nitrate, in 1995, from Region 7 and CEPPPO
- "Identifying Chemical Reactivity Hazards: Preliminary Screening Method" in 2004, from OSWER
- "Explosion Hazard From Ammonium Nitrate" in 1997, from EPA CEPPPO

5. Is there any additional requirements triggered by the EPA WHEN ammonium nitrate is stockpiled at a site in large quantities??

Beyond the requirements under EPCRA and the Clean Air Act 'General Duty Clause', we are not aware of other requirements for the storage of ammonium nitrate.

6. Any other updates you can provide from your folks on site about this incident or about ANY other fires/accidents they investigated that might have been similar in any way.

Nothing beyond the case studies referenced above.

7. Any information you have about emissions other problems caused by a 2009 fire at El Dorado Chemical in Bryan, TX, that caused the evacuation of that town.

Continuous air monitoring was conducted by EPA (monitors and ASPECT), TCEQ, and the RP's contractor (CTEH)... No readings above government-established levels (PEL, STEL) or TLVs were recorded in the community. Community concerns about air quality were referred to the Brazos County Health Department for followup and assessment.

Wes McQuiddy  
Chief, Emergency Readiness Section  
U.S. EPA Region 6 (6SF-PE)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733  
214-665-6722

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**From:** Mason, Steve  
**Sent:** Tuesday, April 23, 2013 10:01 AM  
**To:** McQuiddy, David; Goodfellow, Bob  
**Cc:** Broyles, Ragan; Webster, Susan; Smith, Monica  
**Subject:** RE: Questions

1.

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**From:** McQuiddy, David  
**Sent:** Tuesday, April 23, 2013 9:32 AM  
**To:** Mason, Steve; Goodfellow, Bob  
**Cc:** Broyles, Ragan; Webster, Susan; Smith, Monica  
**Subject:** RE: Questions

Steve & Bob,

Please coordinate a response for all 7 questions below, so that we may respond to XA today.

Thanks,

Wes McQuiddy  
Chief, Emergency Readiness Section

U.S. EPA Region 6 (6SF-PE)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733  
214-665-6722

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**From:** Broyles, Ragan  
**Sent:** Tuesday, April 23, 2013 8:56 AM  
**To:** McQuiddy, David  
**Cc:** Webster, Susan  
**Subject:** FW: Questions

[Wes...I expect that Steve mason may need to provide input on some of the EPCRA aspects of these questions.](#)

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**From:** Smith, Monica  
**Sent:** Monday, April 22, 2013 3:17 PM  
**To:** McQuiddy, David; Webster, Susan; Ruhl, Christopher; Petersen, Chris; Broyles, Ragan; Vela, Austin  
**Subject:** Fw: Questions

[Bob's draft responses.](#)

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**From:** Goodfellow, Bob  
**Sent:** Monday, April 22, 2013 3:10:39 PM  
**To:** Smith, Monica  
**Subject:** RE: Questions

*Bob Goodfellow*

U.S. Environmental Protection Agency  
Prevention and Response Branch (6SF-PC)  
Phone - 214-665-6632  
FAX - 214-665-7447

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**From:** Smith, Monica  
**Sent:** Monday, April 22, 2013 3:02 PM  
**To:** Goodfellow, Bob  
**Cc:** McQuiddy, David; Ruhl, Christopher; Webster, Susan; Vela, Austin; Petersen, Chris  
**Subject:** Fw: Questions

[Bob -can you help with the rmp questions. Please share your drafts w wes. I will be out in furlough tuesday and at an inspection on Wednesday. Thanks](#)

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**From:** Vela, Austin  
**Sent:** Monday, April 22, 2013 2:42:09 PM

**To:** Assunto, Carmen; Smith, Monica; Webster, Susan; [mcquiddy.wes@epa.gov](mailto:mcquiddy.wes@epa.gov)

**Subject:** RE: Questions

Please assist me with starting a draft response. David is on furlough. So, won't be responding until tomorrow.

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**From:** Assunto, Carmen

**Sent:** Monday, April 22, 2013 2:32 PM

**To:** Vela, Austin

**Subject:** RE: Questions

While the osc's are in meetings, would you want to send your questions to 8<sup>th</sup> floor? Monica smith, susan Webster, wes mcquiddy?

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**From:** Vela, Austin

**Sent:** Monday, April 22, 2013 1:39 PM

**To:** Assunto, Carmen

**Subject:** Questions

Let me know if you can have the OSCs look at these questions.

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**From:** Olsen, Lise [<mailto:Lise.Olsen@chron.com>]

**Sent:** Monday, April 22, 2013 1:34 PM

**To:** Vela, Austin

**Cc:** Lobet, Ingrid A

**Subject:** RE: Link

1. One question is why the Risk Management Plan was from 2011? Is that because it was only required to be updated every five years? Would an update be required if suddenly the KINDS of chemicals stored there radically changed (as apparently they did?)

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7. Any information you have about emissions other problems caused by a 2009 fire at El Dorado Chemical in Bryan, Tx that caused the evacuation of that town.

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**From:** Vela, Austin [<mailto:Vela.Austin@epa.gov>]

**Sent:** Monday, April 22, 2013 1:23 PM

**To:** Olsen, Lise

**Subject:** Link

[http://www.epa.gov/region6/newsevents/redacted\\_rmp.pdf](http://www.epa.gov/region6/newsevents/redacted_rmp.pdf)

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Austin Vela

Public Information Officer

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